

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-CV-22671-ALTONAGA/TORRES

DELIO BATISTA,
CARLOS LOPEZ,
MARIANA LOPEZ, and
RAFAELA VALIENTE,

Plaintiffs,

vs.

AVANT ASSURANCE INC.,
REINIER CORTES, AND
ANDREA GONZALEZ QUINTERO,

Defendants.

NAME: The Corporate Defendant with knowledge of the claims and defenses raised in this lawsuit, its general business operations, and matters relevant to the pleadings, and the matters identified in Exhibit "A" hereto.

DATE AND TIME: April 11, 2023 commencing at 10:00 a.m

PLACE: Via Zoom. (link will be provided day before)

Upon oral examination before a court reporting service, a Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court. The deposition will continue from hour to hour and from day to day until completed.

[Certificate of Service on the Following Page]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served on March 29, 2023 to Santiago Cueto, Esq. at sc@cuetolawgroup.com, and Davy A. Karkason, Esq. at dk@cuetolawgroup.com, as *Counsels for Defendants*.

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EXHIBIT A: AREAS OF INQUIRY

1. All employees of Defendant, and other persons known to Defendant with knowledge of any issues or discoverable matter in this lawsuit, including knowledge of the claims and defenses asserted.
2. The factual basis for denying every paragraph that Defendant denied of the Complaint filed by Plaintiff, in whole or in part, in its respective Answer to same.
3. The factual basis for every affirmative defense raised by Defendant in its Answer to the Complaint filed by Plaintiff.
4. The bonus and commission agreements in force during each Plaintiff's time working for Avant.
5. All commission payments made to each Plaintiff by Avant Assurance, Inc. ("Avant"), and the basis for those payments.
6. All bonus payments made to each Plaintiff by Avant, and the basis for those payments.
7. All contracts between Avants and each Plaintiff.
8. Work schedules for each Plaintiff and other people working at/for Avant from 2020 to 2022.
9. Process for signing up customers/clients to Avant form procuring leads to client obtaining insurance.
10. All requests by each Plaintiff for payment of commissions and bonuses.